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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSES TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES

(January 24, 2012)

The United States Postal Service moves for late acceptance of the filing of the responses to the following interrogatories of the American Postal Workers Union, AFL-CIO: APWU/USPS-T4-11, 12, and 13. Identification of responsive information and development of thorough answers to the questions have been diligently pursued from the time the interrogatories were first filed. The time taken to file the responses is a result of the complexity of the questions and to the need for (sometimes extensive) cross-functional coordination and review, the press of Docket No. N2012-1 and other equally important postal business. Today's responses are filed twelve calendar days late. The Postal Service regrets the delay, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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